

1 ROD O. DIVELBISS (SBN 102345)  
2 RDIVELBISS@COLLETTE.COM  
3 JRA LAW PARTNERS, LLP  
(FORMERLY COLLETTE ERICKSON  
4 FARMER & O'NEILL LLP)  
5 235 PINE STREET, SUITE 1300  
SAN FRANCISCO, CA 94104  
TELEPHONE: (415) 788-4646  
FACSIMILE: (415) 788-6929

6 SCOTT E. SILBERFEIN (*Pro Hac Vice*)  
7 MOSES & SINGER LLP  
The Chrysler Building  
8 405 Lexington Avenue  
New York, New York 10174-1299  
9 Telephone: (212) 554-7800  
Facsimile: (212) 554-7700

10 Attorneys for Defendants Northern Leasing Systems, Inc., MBF  
11 Leasing, LLC, Northern Funding, LLC, SKS Associates, LLC, Jay  
Cohen, Sara Krieger, Leonard Mezei and Sam Buono  
12

13 **UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**OAKLAND DIVISION**

16 RAINBOW BUSINESS SOLUTIONS, INC.,  
17 ET AL.,

18 Plaintiffs,

19 v.

20 MBF LEASING LLC., ET AL.,

21 Defendants.  
22

CASE NO. CV 10-01993 CW

JOINT STIPULATION PURSUANT TO  
LOCAL CIVIL RULE 6-2(b) TO  
EXTEND RETURN DATE OF PLAINTIFFS'  
MOTION TO COMPEL  
AS MODIFIED

23  
24  
25  
26  
27  
28 Case No. C 10-1993 CW

JOINT STIPULATION PURSUANT TO LOCAL CIVIL RULE 6-2 TO EXTEND TIME TO RESPOND TO  
PLAINTIFFS' MOTION TO COMPEL AND PLAINTIFFS' MOTION TO SANCTION

1        WHEREAS, on February 18, 2014, Plaintiffs filed a motion to compel Leasing Defendants  
2 (Northern Leasing Systems, Inc., MBF Leasing, LLC, Northern Funding, LLC, SKS Associates,  
3 LLC, Jay Cohen, Sara Krieger, Leonard Mezei and Sam Buono) to produce documents in response  
4 to Plaintiffs' Third Set of Requests For Production ("Plaintiffs' Motion");

5        WHEREAS, under the Local Rules, Leasing Defendants' response(s) to Plaintiffs Motion  
6 would have been due March 4, 2014;

7        WHEREAS, the parties, through counsel, previously agreed, via joint stipulation pursuant  
8 to Local Civil Rule 6-2(b), to extend Leasing Defendants time to respond to Plaintiffs' Motion  
9 from March 4, 2014 to March 18, 2014, and to extend Plaintiffs' time to reply to March 25, 2014  
10 with a hearing on Plaintiffs' Motion set for April 8, 2014;

11       WHEREAS, the parties, through counsel, previously agreed, via joint stipulation pursuant  
12 to Local Civil Rule 6-2(b), to further extend Leasing Defendants time to respond to Plaintiffs'  
13 Motion from March 18, 2014 to March 28, 2014, and to extend Plaintiffs' time to reply to April 2,  
14 2014 with a hearing on Plaintiffs' Motion set for April 14, 2014

15       WHEREAS, Leasing Defendants submitted their opposition to Plaintiffs' Motion on  
16 March 28, 2014 and Plaintiffs' submitted their Reply on April 2, 2014;

17       WHEREAS the parties, through counsel, have agreed, via joint stipulation pursuant to  
18 Local Civil Rule 6-2(b), to further adjourn the hearing on Plaintiffs' Motion from April 14, 2014  
19 to May 6, 2014 as a result of: the availability of Leasing Defendants' Counsel due to the Passover  
20 holiday; the parties, through counsel, continuing to meet and confer in good faith to resolve the  
21 issues set forth in Plaintiffs' Motion; and, Leasing Defendants continuing to produce documents  
22 on a rolling basis;

23       WHEREAS, two prior extensions with respect to Plaintiffs' Motions have been jointly  
24 requested as set forth above;

25       WHEREAS, this schedule will not impact any other scheduled dates;

26       NOW, THEREFORE, IT IS STIPULATED, by and between the undersigned parties  
27 through their respective counsel of record, pursuant to Local Civil Rules 6-1(b) and 2(a), that the  
28

Case No. C 10-1993 CW

1 Court shall adjourn the hearing on Plaintiffs' Motion from April 14, 2014 at 1:30 p.m. to May 6,  
2 ~~9:00 A.M.~~  
~~2:00 P.M.~~  
2014 at ~~9:00 A.M.~~ before Hon. Magistrate Judge Elizabeth Laporte.

3 DATED: April 8, 2014  
4  
5

6 Respectfully submitted,  
7  
8 MOSES & SINGER LLP  
9  
10

/s/ Scott E. Silberfein  
11 Scott E. Silberfein (*Pro Hac Vice*)  
12 Robert Lillenstein (*Pro Hac Vice*)  
The Chrysler Building  
405 Lexington Avenue  
New York, NY 10174  
Telephone: (212) 554-7800  
Facsimile: (212) 554-7700

13 JRA LAW PARTNERS, LLP  
14 (FORMERLY COLLETTE ERICKSON  
FARMER & O'NEILL LLP)  
15  
16

Rod O. Divelbiss  
235 Pine Street, Ste 1300  
San Francisco, CA 94104  
Telephone: (415) 788-4646  
Facsimile: (415) 788-6929

17  
18 Attorneys for Defendants Sam Buono, Jay  
19 Cohen, Sara Krieger, MBF Leasing, LLC,  
20 Leonard Mezei, Northern Funding, LLC,  
Northern Leasing Systems, Inc., and SKS  
Associates, LLC  
21  
22  
23  
24  
25  
26  
27

**GUTRIDE SAFIER LLP**

/s/ Kristen Simplicio

Adam J. Gutridge, Esq.

Seth A. Safier, Esq.

Kristen Simplicio, Esq.

835 Douglass Street

San Francisco, California 94114

Attorneys for Plaintiffs

Pursuant to Local Civil Rule 6-2(a), and GOOD CAUSE APPEARING THEREFOR,

**IT IS SO ORDERED. AS MODIFIED**

DATED: April 11, 2014

Elijah R. D. Laporte  
THE HONORABLE ELIZABETH D. LAPORTE  
UNITED STATES MAGISTRATE JUDGE